

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
AUTOHAUS ACQUISITION, INC., : CASE NO. 1:09-bk-07158
d/b/a VICTORY VOLKSWAGEN, :
Debtor : CHAPTER 7

: JOINTLY ADMINISTERED TO
: THREE ARROWS ENTERPRISES,
: INC., ET AL
: CASE NO. 1:09-bk-07161

STIPULATION

IT IS HEREBY stipulated by and between Lawrence G. Frank, Trustee in Bankruptcy in the above-captioned proceeding, and Law Office of James S. Godderz, Esquire, attorney for Taylor Geoservices, Inc., as follows:

1. Taylor Geoservices, Inc., filed a Proof of Claim, being claim No. 8 on January 7, 2010 in the amount of \$64,496.00.
2. The Trustee filed an Objection on March 15, 2011.
3. The Trustee and James Godderz were in communication about the Trustee's objection and the Trustee agreed that James Godderz would have additional time in which to respond to the Trustee's objection.
4. Unfortunately, nothing was put on the docket and an Order was entered on April 15, 2011 striking the claim.

5. This Stipulation is executed by parties to the above dispute seeking an Order striking the Court's Order of April 15, 2011 and allowing Taylor Geoservices, Inc. to file a response to the Trustee's objection.

WHEREFORE, the undersigned respectfully requests this Honorable Court to enter an Order striking this Court's Order of April 15, 2011 and allowing Taylor Geoservices, Inc. to file a response to the Trustee's objection.

RESPECTFULLY SUBMITTED BY:

/s/Lawrence G. Frank

LAWRENCE G. FRANK, ESQUIRE
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TRUSTEE IN BANKRUPTCY

LAW OFFICES OF JAMES S. GODDERZ

By: 

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ATTORNEY FOR TAYLOR GEOSERVICES,
INC.

CERTIFICATE OF SERVICE

AND NOW, this 21st day of July, 2011, I, Lawrence G. Frank, Esquire, hereby certify that I this day electronically filed the foregoing document with the Clerk of the Bankruptcy Court using the CM/ECF system which sent notification of such filing to the following Filing Users at the following e-mail address:

Office of the U.S. Trustee - ustpreregion03.ha.ecf@usdog.gov

I hereby certify that I have this day served a copy of the foregoing document(s) by depositing same in the United States mail, postage prepaid, addressed to the attorneys or parties of record as follows:

Law Office of James S. Godderz
333 North Princeton Avenue, Suite 100
Swarthmore, PA 19018

/s/Lawrence G. Frank
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Trustee In Bankruptcy